

1 Carmine D. Boccuzzi, Jr. (pro hac vice)
2 Cleary Gottlieb Steen & Hamilton LLP
3 One Liberty Plaza
4 New York, New York 10006
5 (212) 225-2000 (Phone)
6 (212) 225-3999 (Facsimile)
7 cboccuzzi@cgsh.com

8 Jennifer Kennedy Park (SBN 244888)
9 Cleary Gottlieb Steen & Hamilton LLP
10 1841 Page Mill Road, Suite 250
11 Palo Alto, CA 94304
12 (650) 815-4100 (Phone)
13 jkpark@cgsh.com

14 *Counsel for Defendants*
15 *Robert Bosch GmbH and*
16 *Robert Bosch LLC*

17
18
19
20
21
22
23
24
25
26
27
28
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

*In re: Volkswagen 'Clean Diesel' Marketing,
Sales Practices, and Products Liability
Litigation*

This document relates to:

*Iconic Motors, Inc., et al. v. Volkswagen
Group of America, Inc., et al., No. 3:17-cv-
3185-CRB*

LEAD CASE No. 15-md-02672-CRB

BOSCH DEFENDANTS'
ADMINISTRATIVE MOTION TO SEAL

Hon. Charles R. Breyer

1 Pursuant to Local Civil Rule 79-5(c)-(f), Robert Bosch GmbH and Robert Bosch LLC
2 (together, the “Bosch Defendants”) request that portions of Group Exhibit E (the “Exhibit”) to
3 Plaintiffs Iconic Motors, Inc. d/b/a Elgin Volkswagen and Slevin Capital Investments, Inc.’s
4 Opposition to Robert Bosch GmbH and Robert Bosch LLC’s Motion for Summary Judgment,
5 ECF No. 8256 (“Opposition”) remain under seal. *See* ECF No. 8256-13 (Exhibit). On February
6 14, 2025, Iconic Motors, Inc. d/b/a Elgin Volkswagen and Slevin Capital Investments, Inc.
7 (together, “Plaintiffs”) filed an administrative motion to seal various exhibits to the Opposition,
8 including the Exhibit. *See* ECF No. 8252. The Court denied Plaintiffs’ motion to seal the Exhibit
9 without prejudice, pending a showing of “specific grounds to seal or redact” the Exhibit. *See*
10 ECF No. 8257.

11 The Exhibit contains personally identifying information – including the names, contact
12 information, and job titles – of current or former employees of the Bosch Defendants. The Bosch
13 Defendants respectfully request that the Court permit the redaction of personally identifying
14 information of non-party employees of the Bosch Defendants, as proposed in **Exhibit 1** hereto,
15 consistent with this Court’s prior orders to that effect.¹ *See* ECF Nos. 1767, 2059, 4049, 4104,
16 5223, 6321. For the reasons explained in the Court’s prior orders, good cause exists for sealing
17 the personal information of non-parties. *See, e.g.*, ECF No. 1767 at 3-4 (granting the Bosch
18 Defendants’ motion to redact “names, job titles, and other identifying information” of non-party
19 employees because “the disclosure of the non-party employees’ names would infringe on those
20 individuals’ privacy rights” and the sealing of job titles “is [] necessary where the job title can
21 identify the employee.”).

22
23
24
25
26
27
28 ¹ The Bosch Defendants will separately file a proposed public version of the Exhibit with redactions.

1 Dated: February 21, 2025

2
3 By: /s/ Carmine D. Boccuzzi, Jr.
4 Carmine D. Boccuzzi, Jr. (pro hac vice)
5 CLEARY GOTTlieb STEEN &
6 HAMILTON LLP
7 One Liberty Plaza
8 New York, New York 10006
9 (212) 225-2000 (Phone)
10 (212) 225-3999 (Facsimile)
11 cboccuzzi@cgsh.com

12
13 Jennifer Kennedy Park (SBN 244888)
14 CLEARY GOTTlieb STEEN &
15 HAMILTON LLP
16 1841 Page Mill Road, Suite 250
17 Palo Alto, CA 94304
18 (650) 815-4100 (Phone)
19 jkpark@cgsh.com

20
21
22
23
24
25
26
27
28
Counsel for Defendants
Robert Bosch GmbH and
Robert Bosch LLC

Certificate of Service

[28 U.S.C. §1746]

Re: Iconic Motors, Inc., et al. v. Volkswagen Group of America, Inc., et al.

I, Erika J. Davis, Managing Attorney in the Washington, DC office of Cleary Gottlieb Steen & Hamilton LLP, declare that I served the following documents by email on counsel listed below:

- Exhibit 1: Unredacted Proposed Redactions to Group Exhibit E

Ira M. Levin
Burke Warren MacKay and Serritella, P.C.
330 North Wabash Avenue
21st Floor
Chicago, IL 60611
Email: ilevin@burkelaw.com

Andrew Douglas LeMar
Burke Warren MacKay & Serritella PC
330 N. Wabash Avenue
22nd Floor
Chicago, IL 60611-3607
Email: alemar@burkelaw.com

Danielle Jean Gould
Burke Warren Mackay & Serritella, P.C.
330 North Wabash, 22nd Floor
Chicago, IL 60611
Email: dgould@burkelaw.com

Eric Peter VanderPloeg
Burke, Warren, MacKay, Serritella, P.C.
330 N. Wabash Ave.
21st Floor
Chicago, IL 60611
Email: evanderploeg@burkelaw.com

Counsel for Iconic Motors, Inc. and Slevin Capital Investments, Inc.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 21, 2025 in Washington, DC.



Erika J. Davis